



United Egg Producers

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Dockets Management Branch
Docket No. 97N-0074
Food and Drug Administration
12420 Parklawn Drive, Rm 1-23
Rockville, MD 20857

To Whom It May Concern:

The United Egg Producers (UEP) and the United Egg Association (UEA) appreciate the opportunity to comment on the Strategic Federal Food Safety Plan. UEP is a federation of regional cooperatives owned and operated by egg producer members. UEP's membership represents the ownership of about 80% of all the egg-type laying hens in the United States as well as most of the major breeding companies. UEA represents approximately 95% of all further processed eggs in the U.S., amounting to more than two billion pounds per year.

COMMENTS ON THE VISION STATEMENT

We in the egg industry applaud the proposed vision statement, but would urge that it be re-worded so that consumer confidence in food safety is inspired in combination with realistic expectations. The opening sentence, "Consumers can be confident that food is safe..." may be somewhat misleading. Everyone, especially consumers, must understand that there always has been, and always will be, some risk associated with food. The statement should -- somehow -- convey the concept that the hazards are controlled and the risks minimized, but that an absolute guarantee of safety is still an ideal towards which we must continue to work. An expert in risk communication may know best how to convey this information. While consumer confidence in food safety is important, it must be understood that the hazards are difficult to control during production and processing and that even sterilized food can be subject to subsequent contamination from sources as simple as air-borne bacteria.

The last line -- regarding everyone understanding and accepting their responsibilities -- is the most important, and should be the lead sentence of the vision statement because it is the key to reducing food- and waterborne illness. Teamwork is critical. Indeed, we either work together or fall together, and we want to take this opportunity to state unequivocally the intention of the egg industry to be a major positive player on the nation's food safety team. We have everything at stake.

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Several actions are needed to make the vision statement a reality. The statement that the food supply is safe due to surveillance is an overstatement of current capabilities. There are approximately 50 known microbiological pathogens transmitted through food and water; only 6 of these are part of the current surveillance system, in only 8 sites across the nation. Also, non-microbiological hazards are rarely monitored at all. This system needs to be expanded greatly if the word "surveillance" is to be included in the vision statement. The control of new and emergent threats will be best addressed by a steady supply of funds for research in this area. Active thought and study is needed to determine what threats may emerge and what funds are needed to facilitate this process. A risk-based approach should be a scientific approach; therefore, it is unnecessary to include "risk-based" as a separate phrase in the vision statement.

HOW TO STRUCTURE A STRATEGIC PLANNING PROCESS

Structuring a strategic planning process should be done by first identifying the universe of known and suspected food and waterborne hazards. Then, the relative risk of the U.S. population being exposed to those hazards and the relative impact of being exposed to those hazards should be estimated. That information should be assembled by technical experts in food- and waterborne disease hazards. Also, a large advisory panel representing all groups should be formed to assist the Food Safety Council in developing programs and setting priorities on the basis of the list developed by the technical experts.

ADDRESSING CHALLENGES AND MAKING THE BEST USE OF RESOURCES

1. The most important priority for the Federal food safety strategy is to focus on actual hazards as opposed to theoretical risks. Real, not hypothetical, numbers need to be used in making decisions regarding priorities. Funds need to be directed first at known hazards (including new and emerging diseases) and second at theoretical risks. This creates measurable objectives based on empirical data and facilitates the priority setting process. The Federal food safety plan must continually ask if the planned activities will actually stop someone from getting ill. Protecting the food supply is an ongoing challenge because although the risk associated with eating will never be eliminated, it can be controlled and minimized.
2. The ability to detect pathogens with accuracy and speed will always be important in preventing food- and waterborne illnesses. Pathogens need to be detected so that they can be measured, because measurement of pathogens is central to preventing disease. Many of the 50 or so food and waterborne pathogens are not detectable by current techniques, or the only techniques available are time-consuming and very expensive. Providing funds and the directives for research in this area should be a high priority for the food safety strategy.
3. Food safety education should be a core component of public education. Increasing public awareness of foodborne disease and proper food handling practices is one of the most cost-effective ways to reduce food and waterborne illness. Safe food handling is fundamental to healthy living and should be an integral part of our educational system.

4. A special outreach and education program needs to be developed for the food service industry. Research, in the form of studies of a sociological nature, needs to be conducted to determine how to control problems in this segment of the food industry. Food safety professionals have known for years what needs to be done, but problems still emerge from this level. A new approach is needed. Perhaps incentives, in addition to sanctions, could be provided to the food service industry. Addressing problems at the food service level should be a primary element of prevention and intervention strategies, especially in light of the continuing trend towards eating outside of the home.
5. Research funds are needed to develop the data that provides the tools for control of food and waterborne illnesses. Funds are needed for control of pathogens at the production level; research is especially necessary in the area of microbial ecology. There needs to be a better understanding of the pathogenesis of disease in humans and in animals. Sampling and detection techniques are needed to predict accurately the presence of pathogens. The route of transmission of pathogens needs to be better understood, including the role of ecology in disseminating disease. Environmental surveys are needed to determine the possible presence of pathogens. Funds for research need to be a permanent part of any long-term strategy.
6. Communication and partnership between different sectors needs to be improved. Communication of information, especially through the media, needs to be conducted in an accurate and responsible manner. Data from government studies needs to be made available to the public in a timely fashion. Support and incentives for industry programs will encourage industry participation in food safety programs.
7. Comprehensive and stable food and waterborne surveillance systems are central to an effective food safety program. Surveillance needs to be complete, thorough and dependable. Increased thoroughness means fewer false positives. Measurement of disease helps to reduce disease by tracking the success or lack of success of food safety programs.
8. Epidemiological investigations need to be accurate, complete and timely. These investigations need to be coordinated with microbiological data, environmental sampling and an analysis of the way the food was stored, prepared and served. This information helps to identify the causes and contributing factors of disease, which is essential to developing plans that are effective in reducing illness. Epidemiological investigations also provide data that contribute to measurable objectives.
9. Local government needs to be included in this Federal strategy. Funds need to be made available for state and local health programs for outbreak investigations, education and food service inspection. This will help enhance and strengthen prevention and intervention strategies. Improved education, standards and resources at this level will help control transmission of disease.
10. Increasing the use of time and temperature indicators during transportation, storage and display at retail is a simple but effective way to enhance protection of the food supply. The food distribution channel is very complicated. Therefore, a "one size fits all" is not appropriate. Rather efforts ought to be made to tailor effective control temperature measurements programs to the specific commodity.

11. Safe food is dependent upon having safe water. Protecting the water supply becomes more difficult as the population increases. As the population increases, the sanitary disposition of sewage becomes more important and more difficult. Likewise, agricultural production needs to increase to provide more food for more people and agricultural wastes need to be managed in a way that protects water supplies. Both surface and groundwater need to be protected. The egg industry has been a leader in developing more effective and environmentally-friendly methods of waste management and water protection.

POTENTIAL BARRIERS AND GAPS IN PURSUING THE VISION OF FOOD SAFETY

Incentives to encourage the appropriate handling of food and water are far more effective than sanctions. Mandates to ensure safety need to stimulate appropriate actions, not just discourage inappropriate actions. The objective should be to facilitate a team approach at every level.

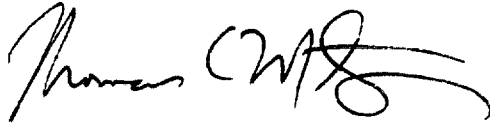
The biggest barriers to reducing the annual incidence of acute and chronic foodborne and waterborne illness can be listed in four categories: funds, commitment, priorities and incentives. Funds and manpower are necessary to ensure the safety of food and water. Food and water are essential to life and there is a permanent need to assure that they are safe; this calls for an ongoing commitment of resources. Monitoring programs, in particular, need to be funded on a continuing basis because disruption of those programs undermines the ability to measure the results of efforts. Perhaps most important is the need to stay focused on the issues that actually cause disease. Historically, food safety funds have been provided on the basis of consumer fears and political agendas. If food and waterborne disease are to be reduced, resources must be directed to activities that are related to morbidity and mortality. Providing resources to prevent theoretical sources of risks and hypothetical problems is the least effective way to prevent disease, and should be done – if at all -- only after programs for the known and emerging hazards are fully funded. Incentives ought to be given in the form of recognizing and rewarding those organizations that implement and maintain high quality food safety or quality assurance programs.

Additional barriers to ensuring food safety exist. There are numerous data gaps. Research data are needed on the ecology of pathogens, the pathogenesis of disease, causes of illness and detection techniques. In the Federal government, the ability to have Full Time Equivalent positions to accompany funds is another barrier to ensuring food and water safety; professionals must be hired on a permanent and stable basis to ensure efficient use of resources and consistency and thoroughness of programs. Finally, a true cooperative working relationship must be established and maintained with the food industry because the biggest barrier to success is the absence of teamwork.

Changes are needed at all levels. The Federal government needs to provide more funds to local public health departments, which are responsible for investigating and intervening at the grassroots level. Public health professionals need a better appreciation of the constraints on food production, processing and marketing. Those involved in food production and processing need to be alert and responsive to current

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and emerging food and waterborne hazards. Food service operations need an entirely new approach to motivating employees regarding appropriate food preparation techniques. And consumers need to be educated and aware of their role in ensuring food safety.



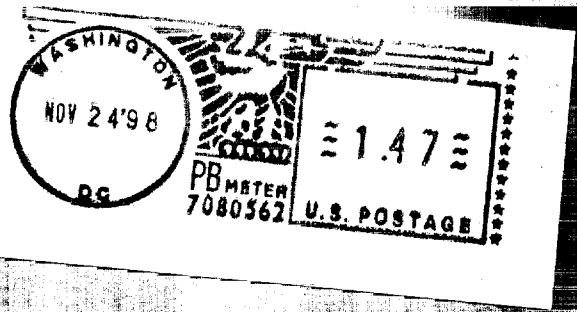
Thomas C. Montgomery, Esq.
Director of Regulatory Affairs

Sincerely,



Albert E. Pope
President

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